

IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF NEW YORK

In re:

PRIME CAPITAL VENTURES, LLC,  
  
Debtor.

Chapter 11

Case No. 24-11029 (REL)

**NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE, that the undersigned, Jay Bender, of the law firm of Bradley Arant Boult Cummings LLP hereby enters his appearance in the above-referenced case as counsel to Creditors, B and R Acquisition Partners, LLC, a Texas limited liability company ("**B&R**") and JHM Lending Ventures, LLC, a Delaware limited liability company ("**JHM**", and, together with B&R, the "**B&R Parties**"), and respectfully requests, pursuant to 11 U.S.C. §§ 342 and 1109(b) and Rules 2002, 9007, 9010 of the Federal Rules of Bankruptcy Procedure (the "**Bankruptcy Rules**"), that all notices given or required to be given in this case, and all papers served or required to be served in this case or in any related adversary proceeding, be given to and served upon the undersigned at the address set forth below.

Jay Bender  
Bradley Arant Boult Cummings LLP  
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PLEASE TAKE FURTHER NOTICE THAT, pursuant to 11 U.S.C. § 1109(b), the foregoing request includes not only the notices and papers referred to in the rules and sections specified above but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading or request, whether formal or informal, written or oral, and whether

transmitted or conveyed by mail, electronic mail, hand or courier delivery, telephone, telecopy, telegraph, telex or otherwise filed with regard to the referenced case and any related adversary proceedings therein.

**PLEASE TAKE FURTHER NOTICE** that this Notice of Appearance and Request for Notice is neither intended to be nor is it a consent of the B&R Parties to the jurisdiction of the Bankruptcy Court, nor shall it be deemed to be a waiver of the B&R Parties' rights (i) to have final orders in non-core matters entered only after *de novo* review by a District Court judge; (ii) to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case; (iii) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; (iv) to any other rights, claims, actions, setoffs, and recoupments to which the B&R Parties are or may be entitled under any agreement, in law or in equity, all of which rights, claims, actions, setoffs, and recoupments the B&R Parties expressly reserve; or (v) to any and all defenses or objections the B&R Parties may have to any claims asserted against them in this action, including, without limitation, any defense based on insufficient service of process, jurisdiction (including personal jurisdiction), or capacity to be sued.

Date: December 16, 2024

BRADLEY ARANT BOULT CUMMINGS LLP

By: /s/ Jay Bender

Jay Bender (AL Bar No. ASB-0773-E29J)

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*Attorney for Creditors B and R Acquisition*

*Partners, LLC and JHM Lending Ventures, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 16<sup>th</sup> day of December, 2024, a copy of this Motion has been electronically filed with the Clerk of the Bankruptcy Court using the CM/ECF system which will send electronic notification of such filing to all counsel of record.

BRADLEY ARANT BOULT CUMMINGS LLP

By: /s/ Jay Bender

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